

IN THE DRAWING

The attached Replacement Sheets of drawing include labels for the various blocks shown in Figs. 1-5, as required in the Action.

REMARKS

In the Outstanding Official Action, Figs. 1-5 of the drawing were objected to due to a lack of labels for the various blocks shown in the figures. In response, replacement sheets of drawings are submitted herewith in which the required changes have been made, and a corrected formal drawing will be provided upon allowance.

In response to the suggestion contained in the Action regarding the preferred layout for the specification, this suggestion is acknowledged with appreciation but Applicant respectfully declines to add section headings as they are not required in accordance with MPEP §608.1(a).

Regarding the objections to the claims because of the noted informalities, the introductory clause to the claims has been amended as suggested, and claim 2 has been amended for improved clarity, also as suggested in the Action. Regarding the objection to Claim 9 as being in improper form due to multiple dependencies, it is respectfully submitted that this informality has already been corrected by preliminary amendment as confirmed with the Examiner on May 16, 2005.

On the merits, claims 2-9 were indicated to be allowable if placed in independent form, while claim 1 was rejected under 35 USC 103(a) as being unpatentable over El-Tarhuni et al, Rademacher, and

in view of Kansakoski et al, for the reasons of record. In response, it is respectfully submitted that claim 1, as well as claims 2-9, contain patentable subject matter, and accordingly the dependent claims have not been placed in independent form at this time, pending a final resolution of the patentability of claim 1.

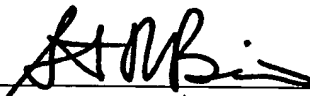
More particularly, it is respectfully submitted that the section 103 rejection of claim 1 over the three cited and applied references is clearly based upon the selection of specific bits and pieces from each of the cited references based upon the impermissible use of hindsight derived solely from the instant disclosure. It is admitted in the Action, that each of the cited references lack essential teachings of the present invention, and it is even admitted that two of the references taken together do not show all of the recited features of the instant invention. Nevertheless, it is suggested that it would be obvious to combine features and replace other features in order to assemble a combination of teachings that would render the instant invention obvious.

Applicant respectfully traverses this rejection for several reasons. First, it is respectfully submitted that, in order to combine and substitute various bits and pieces from three different references there must be some teaching or basis in the art to support this combination. No such basis is provided in the Action,

and it is respectfully submitted that the only basis for making the suggested combinations and substitutions is the impermissible use of hindsight derived from the instant disclosure. Furthermore, it is respectfully submitted that, absent the benefit of hindsight, the numerous combinations and substitutions of features from the three complex references would require impermissible undue experimentation for one of ordinary skill in the art not possessing the teachings of the instant disclosure.

In view of the foregoing, it is respectfully submitted that claim 1 is clearly patentably distinguishable over the cited and applied references, for the reasons detailed above, and that all of the currently-pending claims are now in condition for allowance. Favorable consideration is earnestly solicited.

Respectfully submitted,

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On 6/10/05
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